

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ANDREW LECHTER, et al.)	
)	
Plaintiffs,)	CIVIL ACTION FILE NO.
v.)	1:20-CV-01325-AT
APRIO, LLP f/k/a HABIF,)	
AROGETI & WYNNE, LLP, et al.,)	
)	
Defendants.)	
_____)	

UNOPPOSED MOTION TO ADJUST PAGE LIMITATIONS

Pursuant to N.D. Ga. L.R. 7.1(D), Defendants Atlantic Coast Conservancy, Inc. and Dr. Robert D. Keller (collectively, the “Moving Defendants”) hereby move for an adjustment to the page limitations in Local Rule 7.1(D) in order to file one consolidated, 45-page brief on behalf of the Moving Defendants in support of their Joint Motion to Dismiss the Complaint, showing as follows:

1. Pursuant to the Court’s Scheduling Order of June 4, 2020 (Doc. 60), Moving Defendants’ deadline to file their motions to dismiss the Complaint is presently July 31, 2020.

2. The Complaint is 175 pages and more than 350 paragraphs in length. Plaintiffs’ allegations are broad and voluminous, reaching back to 2008 and encompassing 17 named defendants in disparate industries and across state lines.

3. The Complaint frequently lumps together allegations against the 17 Defendants, and sometimes refers to the Moving Defendants collectively as “the ACC Defendants.” (Doc. 57(e)).

4. Because they are frequently referred to together in the Complaint, and because they are represented by the same counsel, the Moving Defendants intend to file a single brief in support of their joint motion to dismiss the Complaint.

5. Instead of filing two 25-page briefs, the Moving Defendants seek leave to file one brief of up to 45 pages in length, reflecting the efficiencies associated with consolidating their arguments.

6. Plaintiffs have expressed consent to the relief requested in this Motion.

7. This Court has granted three other defendant’s Motions for Extension of Page Limits: Large & Gilbert, Inc.’s Opposed Motion for Leave to File Excess Pages, (Docs. 73 and 80); Defendants Aprio, LLP and Robert Greenberger’s Unopposed Motion for Leave to File Excess Pages (Doc. 116); and Defendant Sirote & Permutt, P.C.’s Motion for Leave to File Excess Pages (Doc. 117).

Accordingly, the Moving Defendants request that they be allowed to submit a single brief in support of their motions to dismiss, not to exceed 45 pages. They also respectfully request that the Court rule on this motion in advance of the briefing deadline so that the Moving Defendants may adjust their briefing accordingly.

A proposed Order is attached for the Court's consideration.

Respectfully submitted this 20th day of July, 2020.

CERTIFICATE OF COMPLIANCE

In accordance with Local Rule 7.1(D), the undersigned counsel certifies that the font and point size, Times New Roman 14 point, used in this filing comply with Local Rule 5.1(B).

This 29th day of July, 2020.

Respectfully submitted,

SMITH, GAMBRELL & RUSSELL, LLP

/s/ Colin Đặng Delaney

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Dr. Robert D. Keller*

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served the foregoing **UNOPPOSED MOTION TO ADJUST PAGE LIMITATIONS** to be filed with the Clerk of the Court by using the Pacer NextGen CM/ECF system, which will automatically send a notice of electronic filing to all counsel of record in this case. No other counsel or parties are known to the undersigned to be entitled to receive service of papers filed in this case.

This 29th day of July, 2020.

/s/ Colin Đăng Delaney

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